

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

EPAC TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	Civil Action No. 3:12-cv-00463
)	
v.)	Chief Judge Crenshaw
)	Magistrate Judge Newbern
HARPERCOLLINS CHRISTIAN)	
PUBLISHING, INC., f/k/a)	JURY DEMAND
THOMAS NELSON, INC.,)	
)	
Defendant.)	

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, EPAC Technologies, Inc. (“EPAC”), files this Motion for Leave to File Under Seal pursuant paragraph 7 of the Amended Protective Order (Docket No. 150) and Rule 5.07 of the Administrative Practices and Procedures for Electronic Case Filing adopted for use in this Court. In support of this Motion, EPAC states as follows:

1. The Amended Protective Order allows for the designation of certain documents as “Confidential” and/or “Attorneys’ Eyes Only” and the filing of such documents under seal.
2. Exhibit B to EPAC’s Motion for Leave To File Motion for Reconsideration of Order (Doc. No. 941) Granting Thomas Nelson’s Motion In Limine No. 1 (EPAC’s Memorandum of Law in Support of the Motion for Reconsideration of Order (Doc. No. 941) Granting Thomas Nelson’s Motion *in Limine* No. 1) contains information that Thomas Nelson has designated “Confidential” under the Agreed Protective Order.

WHEREFORE, EPAC seeks leave to file the foregoing document under seal.

Respectfully submitted,

/s/ William B. Hill, Jr.

Thor Y. Urness (#013641)

R. Brandon Bundren (#030985)

BRADLEY ARANT BOULT CUMMINGS LLP

1600 Division Street, Suite 700

Nashville, Tennessee 37203

615-252-2384

turness@bradley.com

bbundren@bradley.com

Jonathan M. Redgrave

REDGRAVE LLP

14555 Avion Parkway, Suite 275

Chantilly, Virginia 20151

703-592-1155

jredgrave@redgravellp.com

William B. Hill, Jr.

Joseph C. Sharp

Alex Bartko

POLSINELLI, PC

1201 West Peachtree Street NW, Suite 1100

Atlanta, Georgia 30309

404-253-6000

wbhill@polsinelli.com

jsharp@polsinelli.com

abartko@polsinelli.com

Attorneys for EPAC Technologies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing document is being made via electronic mail to the following on November 14, 2018:

Timothy L. Warnock
Steven A. Riley
John R. Jacobson
D. Alexander Fardon
W. Russell Taber, III
Jenny Lyn Harris
Riley Warnock & Jacobson, PLC
1906 West End Avenue
Nashville, Tennessee 37203

*Attorneys for HarperCollins Christian
Publishers, Inc. f/k/a Thomas Nelson,
Inc.*

William J. Harbison, II
Neal & Harwell, PLC
1201 Demonbreun St., Ste. 1000
Nashville, Tennessee 37203

Attorney for Lightning Source, Inc.

Corey W. Roush
Akin Gump Strauss Hauer & Feld LLP
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

*Attorney for HarperCollins Publishers
LLC*

/s/ William B. Hill, Jr.

William B. Hill, Jr.